

On Issues of Concern About the Governance and Direction of the Climate Change Science Program

To: U. S. Climate Change Science Program agency principals

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In the notification I sent to Climate Change Science Program principals on March 2, 2005, that I had resigned my position as Senior Associate in the CCSP Office, I did not discuss in any detail my reasons for leaving the program. I had previously discussed a number of issues and concerns with the CCSP Director and the CCSP Office Director. Further reflection and subsequent developments have persuaded me that it is important that I more fully identify these issues and offer my perspective on them to you, drawing on my years of experience working for the U.S. Global Change Research Program / Climate Change Science Program.

As you no doubt agree, the USGCRP/CCSP has been an extraordinary program, dealing with issues of fundamental scientific and societal significance. I have always tried to work for the best interests of the program, to communicate the value of the scientific research it supports, to strengthen its ability to carry out the mission of science in service to society, and to protect its credibility and integrity. The viewpoint I put forward is driven by my concern for the program, its role and its future, and by the need for climate research and assessment findings to be communicated and used effectively so as to help society and policymakers address the problem of climate change.

I know that you must have the same sense of pride that I feel for having been engaged in the work of supporting research and assessments to address climate change issues and concerns. It is because of this commitment to honest communication of climate change issues that I could no longer work under the politicization of the CCSP that is undermining what most of you are working so hard to accomplish. I hope that you will not ignore what I hope to convey to you.

I believe there is a set of interrelated problems with the current policies and direction of the program that bears on your own leadership responsibilities as a principals group -- as essentially the board of directors of the program. I believe the overarching problem is that the administration -- acting primarily through key positions in the Executive Office of the President, and to some extent the State Department, and aligning itself with some of its key allies -- does not want and has acted to impede forthright communication of the state of climate science and its implications for society. I know I am not alone in believing that the administration's political and policy commitments have had a deleterious effect on some essential aspects of the USGCRP/CCSP.

The problem is manifested especially at the points at which the key scientifically based assessments of climate change touch on the arenas of policymaking and research planning. The administration will not accept and use appropriately the findings and conclusions of the national and international climate assessments, and it hinders and even prevents the climate science program from doing so. In 14 years – 10 years working with the program and, before that, with the House Science Committee – I have seen the program and its leadership go through a lot of changes. Each administration has a policy position on climate change. But I have not seen a situation like the one that has developed under this administration during the past four years, in which politicization by the White House has fed back directly into the science program in such a way as to undermine the credibility and integrity of the program in its relationship to the research community, to program managers, to policymakers, and to the public interest.

This politicization is manifested in how the high-level CCSP governance process works, especially in the relationship between administration political officials and agency program managers; in how climate science is expressed in program reports; and in how the program’s “decision support,” assessment, and communication functions are being framed and developed. There are numerous examples, and some indications that the situation may have worsened since the November 2004 election. I will focus on just a few of them that have been particularly significant in shaping my own view of the program, its direction and leadership, and thus in influencing my decision to object and resign.

National Assessment

A flagrant and fundamental example of the politicization of the CCSP has been the treatment under this administration of the U.S. National Assessment of the Potential Consequences of Climate Variability and Change. The National Assessment is the most substantial scientifically based climate change assessment project in the history of the program to date, and the program’s pioneering experiment in modes of stakeholder engagement and societal relevance. The administration decided early-on to essentially send the National Assessment into a black hole, insofar as the White House has required the CCSP to systematically delete any substantive reference or use of it in program planning documents and reports to Congress – i.e., it has been censored out of the CCSP Strategic Plan, the annual editions of *Our Changing Planet*, and substantive internal discussion.

I think it is widely understood in the program and in the scientific community that the reasons for this are essentially politically driven, not scientific – although the administration has contributed to some confusion about the matter. And I believe that a number of the subsequent issues on which the program has gone off the right track and allowed political considerations to undermine scientific integrity can be traced back to the program leadership’s failure to respond to the attack on the National Assessment.

The National Assessment was built on a solid foundation of research supported by the USGCRP and went through an extensive four-stage expert and public review. It entrained the contributions of a distinguished National Assessment Synthesis Team and of hundreds of other scientists and produced a set of reports that to this day remains the most comprehensive and authoritative scientifically based assessment of the potential consequences of climate change for the United States. It was a primary basis for Chapter 6 on “Impacts and Adaptation” of the *U.S. Climate Action Report 2002*, which was submitted by the U.S. Government pursuant to the national reporting requirements of the Framework Convention on Climate Change, after having been approved by all relevant agencies. In spite of this being the most complete and most widely reviewed position statement on climate change by this administration, the *U.S. Climate Action Report 2002* was almost never mentioned after it was issued and for some reason does not appear to be viewed by the administration or the CCSP as an official acceptance of National Assessment findings. The National Assessment can certainly be subjected to critique and is worthy of a serious discussion of “lessons learned”, in which the CCSP should participate, but as a pioneering effort it was a major accomplishment, of which I believe the program can justifiably be proud.

In its reviews of both the November 2002 discussion draft of the CCSP Strategic Plan and the revised version finally issued in July 2003, the National Research Council was highly critical of the failure of the program to incorporate and build on the National Assessment in its strategic planning for assessment and “decision support” activities. Recall that the report of the NRC special committee to review the Strategic Plan said:

It is especially important that CCSP synthesis and assessment products be independently prepared, or evaluated, by the science community. This will provide a level of credibility that reports produced exclusively within the government sometimes fail to achieve. The only previous centralized assessment effort by the CCSP agencies, the U.S. National Assessment on the Potential Consequences of Climate Variability and Change, followed these credibility assurance guidelines. The National Assessment’s Overview and Foundation reports are important contributions to understanding the possible consequences of climate variability and change. The processes of stakeholder engagement and transparent review of the National Assessment reports were exemplary....

The strategic plan...should more effectively build upon a growing capability within the U.S. climate and global change research community to interact with potential users of climate and global change science, as was demonstrated in the U.S. National Assessment....The revised plan generally overlooks the insights and relationships that were developed by the National Assessment. For example, the experience developed in assembling and maintaining networks of university researchers and stakeholders in different regions of the country is extraordinarily valuable, as are the networks themselves. These relationships should be supported if the CCSP is going to maintain strong stakeholder involvement. The plan also does not include areas of research relevant to regional-scale assessments identified as a result of the National Assessment....This deficiency needs to be remedied quickly so that the program’s decision support activities reflect what the scientific community now knows, what it can accomplish, and what users would like to know....

Many participants at the [CCSP] December 2002 workshop criticized how the draft strategic plan treated the National Assessment, as did this committee in its first report. The revised plan does not reflect an attempt to address these concerns, and no rationale for this decision has been provided. (National Research Council of the National Academies, *Implementing Climate and Global Change Research: A Review of the Final U.S. Climate Change Science Program Strategic Plan*, 2004, pp. 13, 14, 29-30).

Although the OSTP Director has referred to the Academy as the “gold standard” of scientific advice to the government, the administration has stonewalled on this issue and the CCSP leadership has offered no response to the NRC critique.

The process of suppressing references to the National Assessment in USGCRP/CCSP publications began as early as mid-2001. During the same period that the President gave a speech to the effect that the potential impacts of climate change are a serious issue that needs to be addressed, and announced a Climate Change Research Initiative purportedly intended to accelerate the development of scientific information to support decisionmaking, I was directed by an official at the Office of Science and Technology Policy (who is now the OSTP Associate Director for Technology), via a phone call from a staff intermediary, to delete all reference to the National Assessment from the FY 2002 edition of *Our Changing Planet* (OCP2002), the first annual report to Congress of the program under this administration.

A draft of OCP2002 that had gone through final review and clearance by USGCRP agency principals by the end of May 2001 contained a single page describing the National Assessment project, without any

substantive discussion of findings. Two months later, in the draft that went for clearance by the Executive Office of the President level, the acknowledgement of the existence of the National Assessment had disappeared. This issue was never taken up by the USGCRP principals, but the White House political signal had been sent. The high-level suppression of reference to a major USGCRP-supported project was a first in my six years of experience with the program to that time, and in the experience to that point of managing and editing six editions of the annual report. OSTP did not put its review comments in writing as part of the program record, thus also establishing a precedent for unattributed Executive Office interventions in the review and clearance of text of USGCRP/CCSP publications.

The suppression of all but the most fleeting and uninformative references to the National Assessment has continued throughout all subsequent CCSP publications, including most significantly the CCSP Strategic Plan and its accompanying "Vision" document, the OCP2003 and OCP2004-2005 reports to Congress, internal documents related to CCSP budget and planning, and documents pertaining to the development of the current prospective CCSP "synthesis and assessment" reports. In any review draft of any of these documents that contained even the briefest discussion of the National Assessment, either the Council on Environmental Quality or an unattributed reviewer (but clearly either from CEQ or OSTP) would call for the text to be deleted.

Little such direct intervention, on this and various related matters, has even been necessary, however, because report authors and editors in the agencies and the CCSP Office quickly adapted to engaging in a kind of anticipatory self-censorship on this and various other matters seen as politically sensitive under this administration. The inducing of anticipatory self-censorship in career professionals at an early stage of the administration, so that a result can be achieved without requiring much direct intervention or censorship, has been one of the deleterious influences of the administration on the CCSP.

The administration, without ever clarifying the issue forthrightly (at least not on the record), has allowed a perception to persist in some quarters that the suppression of the National Assessment was pursuant to the requirements of a legal agreement. This has provided a convenient basis on which CCSP leaders have rationalized a kind of evasiveness on the subject.

This was evident, for example, in the principals meeting in the CCSP Office conference room on August 21, 2003, at which there was an extended discussion about preparing for CCSP presentations at the National Research Council the following week to the special committee that was reviewing the revised CCSP Strategic Plan. The meeting was chaired by the NASA principal in the absence of the CCSP Director. On the subject of "where do we anticipate critical questions?" a key issue was, where is the National Assessment, why is it still absent from the revised plan?

The discussion at the meeting basically turned to trying to figure out how to finesse this issue, i.e., along the lines of, we're continuing to do important climate change assessments...we've taken ideas from the National Assessment...the National Assessment is not the only assessment...and so forth. It seemed to me rather like creating a cover story. I intervened and said, the members of the NRC committee may let you get by with this, but everyone in the room is going to know that if you give a presentation like what you've just described, you're being evasive. The CCSP Office Director stated that the CCSP Director had been given to understand that there is a legal agreement under which the National Assessment cannot be cited. He said, I don't think we can get into that with the Academy because none of us has seen any documentation, it's never been discussed with us, we don't know what is in it. The NASA principal said, I don't want to get into these legal issues, we're not conversant. If they ask about it we'll just say we'll get back to you on it. And the meeting moved on.

Why this real or purported ignorance? I have read the court records for the two lawsuits that were filed and then settled. In a nutshell, I believe the implication that there is a legal necessity for the suppression

of the National Assessment is a misrepresentation designed to cover a political agreement by the White House to deep-six the National Assessment in conjunction with settling a politically-driven lawsuit first filed in October 2000 by Competitive Enterprise Institute et al (including Senator Inhofe). In the court record on this lawsuit, which mainly alleged a number of violations of the Federal Advisory Committee Act, there is a one-page document that says the lawsuit is withdrawn. There is a joint stipulation in connection with dropping the lawsuit, which repeats some boilerplate from an OSTP memorandum to the effect that the National Assessment “does not and will not serve as or as the basis for any policies, positions or rules of the Federal Government of the United States, but that it constituted a submission by a non-governmental body and would be considered by policymakers as such.” A memorandum from the then-Acting Director of OSTP clarified for the record that the National Assessment was produced by an advisory committee under the Federal Advisory Committee Act – and as such, didn’t represent U.S. Government policy or regulations. There does not appear to be any documentation in the legal record stipulating, in exchange for dropping the lawsuit, that the USGCRP/CCSP is not allowed to cite or use the National Assessment in science program planning and reporting documents, e.g., in the strategic plan or reports to Congress or others on science program activity. There may have been a secret political agreement with the White House that the National Assessment would not be used by the administration, but such an agreement would, in my judgment, be a form of political corruption of the governance of the CCSP.

The National Assessment is an advisory committee report by a distinguished panel of experts – not a policy or regulatory document. But neither is any of the other material cited in the bibliography of the CCSP Strategic Plan, or any of the research and assessment studies referred to in the *Our Changing Planet* annual reports to Congress and other program documents – all the IPCC assessment reports, Academy reports, highlights of scientific research, and so forth. It’s all scientific information – cited for the purpose of developing priorities for a scientific research and assessment agenda.

The second lawsuit, filed in 2003 by the Competitive Enterprise Institute, attempted to use the Federal Data Quality Act (FDQA) to have the National Assessment documents deleted from the USGCRP Web site – “byte burning” is one term I have heard used to describe this approach. The lawsuit was dismissed with prejudice. From my understanding of its main contention, it was basically without merit. The court record provides no basis that I can see for a claim that the National Assessment can’t be used in the manner that the Academy has called for. Nonetheless, OSTP required the adding of a misleadingly-worded disclaimer on the National Assessment page on the program Web site. The administration has stonewalled a call by members of the science community (sent as a letter to the CCSP Director) to correct the errors.

Thus, while the lawsuits were dropped, the administration accommodated the groups and individuals who had brought them by giving them politically what they could not achieve with bogus legal challenges. The administration has acted as though politicians and lawyers who want to label the National Assessment as “junk science” have more credibility than the Academy, and more than the outstanding individuals who served on the National Assessment Synthesis Team, and the many scientific experts who authored the other volumes of the assessment reports. Allowing misrepresentation and slander of the National Assessment to go uncorrected and unchallenged reflects poorly on the CCSP and its leadership. It sends a chilling message to the research and assessment community about how their expertise, contributions, and good faith are valued, and could be seen as a betrayal of certain colleagues who played leading roles in both building the USGCRP and coordinating the National Assessment. In my judgment the program has never really recovered from this blow to its credibility and integrity.

This is not water under the bridge, as the CCSP leadership seems to prefer, but an issue still needing to be confronted. A proposal for a major NRC study on lessons learned from climate and global change assessments, drafted in response to a request from the CCSP in the spring of 2004, could and should be an

opportunity, among other things, to generate the kind of honest and useful discussion of lessons learned from the National Assessment that the CCSP has demonstrated itself unwilling or unable to conduct on its own. That would be just one component of a study with multiple components, looking both retrospectively and proactively at climate change assessments, but presumably it should be a significant component.

However, discussion of the proposed study among CCSP principals at a meeting on August 31, 2004, clearly indicated what seems to me to be a desire to avoid exactly that. I found this discussion troubling. The NASA principal, after first indicating a reluctance to address this meeting agenda item at all, led off by stating his concern that the proposed study would re-open the controversy about the National Assessment. He said, I don't think we want to go back to that. Then the State Department principal said, essentially, no, we don't want to re-open that. And it went around the table and several principals basically reinforced that position. I was especially taken aback when the EPA principal, who has guided his own program strongly in the direction of assessments of potential consequences of global change, stated a position, in effect, that the NRC study should not be designed to do anything that could be construed as evaluating the National Assessment. The comments of several of the participants seemed clearly tactical, designed to steer clear of trouble on an issue that is politically sensitive to the administration. Nobody would step up and make a direct, principled statement about the National Assessment. A basic thrust of the discussion seemed to be, we've been there, we've done that, why re-open it, we've had that discussion. I thought at the time: Where? When? In fact the CCSP has never had that discussion — not on the record. And a year after the CCSP first requested the NRC prepare a proposal for a lessons learned study, no study had been green-lighted.

The Synthesis Reports

Building appropriately on the pioneering work of the National Assessment could have had a salutary influence on developing the priorities of the CCSP Strategic Plan and surely would have led the program toward a different overall configuration of follow-up assessment priorities — among other things, on priorities that the recent GAO report points out are missing from the current set of prospective CCSP synthesis reports. It could have led to a different approach to evolving the discourse between scientists and users of information — “stakeholders” — a freer relationship and one less constrained by administration gatekeepers concerned with controlling the flow of communications.

The 21 prospective synthesis reports address a number of interesting and significant scientific issues — each is potentially valuable — but taken together they do not add up to a coherent product that would effectively inform society and policymakers responsible for dealing with the climate change problem. The great effort that will be expended over a period of years by a large number of scientific expert authors and reviewers in producing these reports will, in effect, “run out the clock” on 8 years of this administration without even coming close to making good on the program's promise in 2002 to move into a new “period of comparative analysis of response strategies” (see *Our Changing Planet* FY 2003, p.3).

There are other problems with the prospective CCSP synthesis reports. First, the guidelines for final review and clearance of the reports do not guarantee the scientific independence of the reports and open an avenue for political interference. The critical review comments on the draft guidelines from a year ago are posted at the URL <http://www.climatescience.gov/Library/sap/guidelines-comments/default.htm>. I note in particular the extensive comments from Susan Solomon, a reviewer at NOAA who also currently serves as Co-Chair of IPCC Working Group I. Her comments bearing on the credibility and integrity of the process for producing and reviewing the synthesis reports include:

[T]he authors must have independence in their work if the reports are to be credible. Agencies, CCSP principals, OSTP, or others should not have oversight, and they certainly should not have a right of

final review. Many people can and should participate in providing written review comments, but any oversight mechanisms should involve only distinguished scientists. Agencies should not have authority for appointing authors. Reports will only be credible if a distinguished scientific committee is convened to choose the authors....

Scientific judgment should be the guiding force and final arbiter in the responses to the review process. Senior distinguished review editors are a helpful role used in IPCC. These individuals must be scientists of very strong reputation, and they should be asked to evaluate whether the authors have responded appropriately to the reviews. Putting agency persons in that role would not be credible.

Any feedback to the author teams from e.g., the agencies, the CCSP principals, OSTP, or others must be written down (not verbal) and made fully public. No anonymous or informal feedback should be permitted from any of these sources, and this should be stated.

These and other critical points were raised very strongly at an NRC committee meeting in the spring of 2004.

Second, putting the synthesis reports under the most rigorous requirements of the Data and Information Quality Act was, in my judgment, a decision driven at least in part by the political sensitivity of the administration to forthright discussion of climate science. The Data and Information Quality Act creates additional avenues for mischief through intervention by outside parties with vested interests — see, e.g., "Truth and Science Betrayed: The Case Against the Information Quality Act," by Thomas McGarity (University of Texas School of Law) et al.

After a long period of time went by — more than 16 months after the release of the CCSP Strategic Plan — the final guidelines for the synthesis reports were posted on climatescience.gov in December, without fanfare. At the CCSP principals meeting on December 1, 2004, the CCSP Director announced that they were ready to post. He said the process of finalizing the guidelines had "consumed a tremendous amount of time," working with lawyers and so forth, and that the decision to publish the reports as government documents had added complexity to "a very daunting process." It had been clear for some time that the final form of the guidelines was being negotiated at a political level within the administration, and my understanding is that the particulars of this negotiation were not shared with the CCSP agency representatives. There was essentially no discussion in the meeting about the thorny issues that required more than 16 months to resolve after the release of the CCSP Strategic Plan, or of how they were resolved. There was no acknowledgement or discussion of how the final guidelines pretty much stonewall the critics on the issue of lead author independence.

The guidelines say:

The National Science and Technology Council (NSTC) will be responsible for final review and approval of the synthesis and assessment products....

Once the CCSP Interagency Committee has determined that the synthesis and assessment report has been prepared in conformance with these guidelines and the Data Quality Act, the Committee will submit it to NSTC for final review and approval. Approval will require the concurrence of all members of the Committee on Environment and Natural Resources. Comments generated during the NSTC review will be addressed by the CCSP Interagency Committee.

Once NSTC approval has been obtained and the product is finalized, the lead agency(ies) will produce and release the completed product....

What is the reality today behind the NSTC (formally chaired by the President, or delegated to the OSTP Director) and CENR? On the NSTC home page <http://www.ostp.gov/NSTC/html/NSTC_Home.html>, the calendar of NSTC-related meetings has not been updated for 5 months (and in any case contains no reference to CCSP meetings), the NSTC documents listing does not include the CCSP reports to Congress OCP2003 and OCP2004-2005, and on the NSTC home page there is no reference to the activities or even the existence of the CENR. A link on the CCSP Web page embedded in the text on the synthesis report guidelines (not reachable from the OSTP and NSTC home pages) <<http://www.ostp.gov/NSTC/html/committee/NSTCCENRCommitteeLeadership.htm>> lists as CENR leadership the NOAA Administrator, the OSTP Associate Director for Science, and a “vacant” position for an EPA representative, but does not otherwise indicate the members of the CENR who must unanimously clear CCSP synthesis reports.

The OSTP Web site also lists only a draft charter for the CENR, a document that is neither dated nor signed – suggesting that the CENR does not even have a valid charter. It is not at all clear from this information that the CENR is a real, functioning entity, with a membership, that engages as a committee in any activity or produces anything other than, at some time in the future, controlling final approvals of prospective CCSP scientist-drafted synthesis reports. The research community and climate assessment information users might well wonder about this arrangement, which appears to send scientific reports into something of a black box of administration internal processes.

The extent to which administration politicals and other officials will, in practice, intervene in finalizing particular reports, and how, once draft reports have run the complex bureaucratic and review gauntlet to get to the final review and approval stage, is not clear. Many of the reports address scientific and technical issues that are not really proximate to what I think of as decision support, and as such may not be particularly sensitive politically. Regardless, I believe the science community has a right to be concerned about the integrity of the process. These actions occur in the context of a widespread distrust of the political leadership of this administration in the scientific community — for exactly the reason that the administration has come to be perceived as not keeping politics out of science. Under the current administration, the OSTP Director from the outset set a tone of speaking evasively about the state of the science on climate change. That, and his subsequent response to reports documenting the administration’s politically-driven interference with scientific integrity in a number of areas, have contributed to the atmosphere of mistrust. The issue of CCSP documents, and the role of OSTP jurisdiction over them, will be viewed in the context of this larger pattern, and the CCSP will likely be saddled to some extent with the administration’s overall reputation.

The administration chose to require that all of the CCSP synthesis reports be government documents rather than, for at least most of them, following a more straightforward path of asking independent scientists to write them and let the chips fall where they may. I believe this is not the best approach and that it has led the CCSP into a set of problems that could and should have been avoided. I don’t know who or what was behind the decision to subject the reports to these provisions. The CCSP Director has offered the rationale that reports that are vetted and cleared by the government are more likely to have buy-in from high-level policymakers — that the reports will be taken more seriously as “decision support resources” than would reports from independent teams of authors. Perhaps there is an implication that it was easier for the administration to dismiss the National Assessment because it was authored by a FACA-chartered team and thus was “unofficial” or something like that (although the rationale in making the original choice was to ensure the independence and credibility of the reports).

In any case, I believe this perspective is fundamentally flawed. At least in the case of this administration, it seems clear that high-level policymakers will take up any source on the scientific assessment of climate change that they perceive as congenial to their policy predilections and will discount or ignore any source

that states implications and draws conclusions that might be taken to imply the need for a reconsideration of policy – regardless of where the material comes from.

Thus, for example, this administration has, in a number of ways, through its actions (or inaction), played down the IPCC assessments, which are extraordinarily well-vetted and with policymaker summaries signed off line-by-line by government representatives, as well as other major scientifically based assessments supported by the CCSP participating agencies. At the same time, in defending against a climate change-related lawsuit filed by Friends of the Earth et al. against the Export-Import Bank and the Overseas Private Investment Corporation, to whom did the Justice Department turn for developing a science brief? Not to the CCSP, which the administration supposedly regards as its vehicle for developing policy-relevant “decision support” material. Not to Mike MacCracken, a scientist who has been closely involved with the USGCRP, as well as the IPCC and other major assessments – he wrote the science affidavit for the plaintiffs, summarizing the results of the IPCC and National assessments and relating them to the situations faced by the plaintiffs in the four key cities. Instead of turning to sources with broad credibility and acceptance in the scientific community, the U.S. Government submitted a brief by David Legates, an associate professor not involved in the CCSP, whose main claim to fame appears to be as a global warming “skeptic”, and who writes about his particular personal points of opposition to the more widely-authored and thoroughly-vetted assessments. (The relevant documents are posted at <www.climatelawsuit.org>. Also see “Global Warming Skeptic Argues U.S. Position in Suit,” *Science*, 22 April 2005, p. 482.) Was this brief, submitted as part of the U.S. Government’s case, peer-reviewed via the CCSP or anyone else? Were the CCSP principals consulted on the choice of Prof. Legates to represent the government on the science in this lawsuit? With whom did the Justice Department consult in making this choice? Doesn’t this episode, four years after the announcement of the President’s Climate Change Research Initiative and almost two years after the release of the CCSP Strategic Plan, seriously undercut the argument that decision-support resources need to be government publications in order to get buy-in from the administration?

Direct involvement of administration politicals in science program governance

The NRC review of the CCSP Strategic Plan warned:

Involving high-level political leaders in CCSP management helps to provide the program with resources that it requires, but also allows the possibility that the program’s priorities or scientific results could be influenced by political considerations. Either the reality or perception of such influences could discredit the program unless independent evaluations of the program and its products are conducted on a regular basis. (*Implementing Climate and Global Change Research: A Review of the Final U.S. Climate Change Science Program Strategic Plan*, 2004, p. 21)

The NRC review referred explicitly to potential problems given the high-level political oversight in the administration’s new management structure for the CCSP, i.e., under the Secretaries of Commerce and Energy and various subcabinet officials. In fact, CCSP governance has been politicized almost since the start of this administration four years ago. Especially starting in the spring of 2002, there were certain changes in CCSP governance from the practice of the previous administration that I saw as particularly problematic.

I will focus here on the immediate problems and leave aside the ouster, at a USGCRP principals meeting in April 2002, of Margaret Leinen, who had been chairing the USGCRP collegially and leading its strategic planning effort, by OSTP Director Marburger and NOAA Administrator Lautenbacher, in an unceremonious, ungracious, and unappreciative performance that must have left a bad taste with anyone present who knew and cared about the program.

In a nutshell, political officials from the White House Council on Environmental Quality and the State Department who are not career science program managers, and whose job is essentially to advance the administration's position on climate change politics and policy, have participated directly in the governance of the science program. CCSP publications require their review and signoff. Their involvement sends a political signal to CCSP agency representatives and career science managers.

The Executive Office of the President, starting in 2002, placed the CEQ Chief of Staff, Phil Cooney – a lawyer and former official with the American Petroleum Institute, the main lobbying arm of the oil industry – at the table at CCSP principals meetings as the CEQ liaison. This individual, and CEQ generally, have been especially notable in the administration's commingling of politics and science. The CEQ Chief of Staff removed his name from the masthead of CCSP publications as of the last edition of *Our Changing Planet*, published in 2004, and designated a new CEQ liaison to the CCSP principals committee. However, he remains engaged with the program and CEQ continues to play an important role as a White House agent in CCSP governance. Here are a few brief examples:

(1) In a memorandum dated October 28, 2002, he marked-up the first draft of the CCSP Strategic Plan after it was approved by CCSP agency principals and before it was released for NRC review and public comment. Most of his roughly 200 text changes were incorporated in the review draft. A number of these changes in text relating to questions of climate science altered the content of the draft as it had been developed by federal science program professionals. Taken in the aggregate, the changes had a cumulative effect of shifting the tone and content of an already quite cautiously-worded draft to create an enhanced sense of scientific uncertainty about climate change and its implications. The draft Strategic Plan was legitimately criticized by reviewers who charged that the CCSP had adopted a vocabulary with an exaggerated emphasis on scientific uncertainties. To my knowledge this CEQ mark-up was not shared with or vetted by CCSP principals or CCSP agency science program managers. The process was quintessentially non-transparent and, in my view, a policy-driven political interference in a key science program document.

(2) Then, in the final review of the revised CCSP Strategic Plan (the Final Technical Review draft dated June 2, 2003), CEQ made about 450 comments throughout the document, with an especially strong focus on the introductory and framing chapters and the chapters on Atmospheric Composition, Climate Variability and Change, Ecosystems, Human Contributions and Responses, and Decision Support Resources. Many, if not most, of these comments fell into some systematic patterns, including alteration of science-related text, generally either to downgrade the significance of certain issues of concern or to downgrade accomplishments of previous scientific work by creating an enhanced sense of scientific uncertainty, and attempts to substitute CEQ's judgment for that of science program management about research priorities and ways of expressing the payoffs from research. For example, the CEQ comments tended to alter or delete references to potential public health impacts, the importance of focusing research at the regional level, the relevance of social science involvement, the potential for major changes (e.g., in the Arctic), and the value and significance of climate models and their projections. The CEQ comments altered definitions of science terms, for which the program had generally used approved IPCC and AMS language.

Several of the CEQ comments were simply incorrect. My main conclusion from a careful review was that the overall effect of the comments was a cumulative one — that to incorporate the bulk of the CEQ comments would have the overall effect of weakening and slanting the document, in how it discussed the scientific issues, presented the current state of science, and portrayed the research program and its priorities. The extensive CEQ mark-up shifted the tone away from what the scientists and program managers who drafted the document had put forward after a long and taxing good-faith effort. This thus became another White House policy-driven intervention that would have a negative effect on the quality

and credibility of the document. I believe the CEQ mark-up was never shared with or vetted by CCSP agency principals or agency science program managers.

In late June 2003 the CEQ comments were rolled into a 130-page compilation of collated comments on all the chapters of the plan from all the participating agencies and were to be addressed by multiple staff “editors” of individual chapters. I wrote a memo to the CCSP Director and CCSP Office Director making all the above points and arguing that, in this case, the usual procedure of revising on a comment-by-comment, chapter-by-chapter basis would balkanize and mask the nature of the problem, which instead needed to be confronted directly at the program leadership level. In the end, in the published Strategic Plan, most of the more problematic CEQ comments were not adopted — some were, and the damage to the document was significantly limited. I give the CCSP Director a good deal of credit for pushing back on this matter.

(3) It is my understanding that the CEQ Chief of Staff played a lead role as White House agent for enforcing the suppression of the National Assessment and the systematic removal of meaningful references to it from CCSP publications. If this was pushed on the CCSP leadership as ostensibly a legal requirement pursuant to the lawsuit settlement, I am not aware of any effort by CCSP principals to obtain appropriate clarification and documentation. I believe the CCSP leadership got rolled on this matter by the White House political operation. Further, public disclosure of the CEQ Chief of Staff’s communication with the Competitive Enterprise Institute, which filed the lawsuits against the National Assessment, suggests joint political strategizing — an insult to the CCSP leadership and to the climate change research and assessment community, and another indicator of the inappropriateness of CEQ jurisdiction over the science program.

(4) CEQ has also intervened in the final review and clearance of CCSP annual reports. For example, the CEQ Chief of Staff made about 100 revisions to the final draft of the FY 2003 *Our Changing Planet*, some of which substantially changed or deleted text on program activities such as those relating to decision support on mitigation and adaptation options, integration of climate science with comparative analysis of response strategies, ongoing regional assessments of global change consequences, and the relationship between energy-related emissions, climate change, and ecosystem impacts.

In general, I believe the Strategic Plan and other CCSP documents have been weakened by a process in which reports are drafted and edited with an anticipatory eye to what will be able to obtain CEQ approval, which appears to be the final step in the White House clearance process.

Also, under this administration, the State Department CCSP principal, Harlan Watson, is a political, the administration’s senior climate treaty negotiator. His job consists, among other things, of politically justifying the administration’s position vis-à-vis the Kyoto Protocol and other ongoing issues under the Framework Convention on Climate Change, at the same time that he participates in the governance of the science program and in the review and clearance of text of science program documents. Under the previous administration, the State Department representative, at least during the years that I was with the program, was a career science technocrat whose limited participation consisted primarily of facilitating the relationship between the USGCRP and the IPCC process.

Instead of promoting and communicating the conclusions of the IPCC assessment reports — which are generally recognized as the most authoritative and comprehensive scientific assessments of climate change — and using them to inform policymaking or building on them explicitly in strategic research planning, this administration has avoided forthright public communication about the IPCC at every turn. Just one example of this that came my way pertained to the FY 2003 *Our Changing Planet*. The draft for final review by CCSP agency principals contained a set of boxes that summarized “Key Research Findings and Scientific Uncertainties in Reports by the IPCC and National Research Council,” drawing

primarily on the IPCC Third Assessment Report (TAR) of Working Group I and to a much lesser extent Working Group II (which had been published the previous year), along with material from the NRC June 2001 report on climate change key questions. The material balanced findings and uncertainties throughout. The CCSP Director and all but one of the other agency representatives cleared the report with this text in it.

However, in an October 4, 2002, memo with his review comments the State Department principal said: "I strongly recommend deleting the boxes...The wording in each appears to have drawn primarily from the summaries of the IPCC TAR Summaries for Policymakers (SPM) and do not include an appropriate recognition of the underlying uncertainties and the tentative nature of some of the assertions...." (This after the U.S. Government along with the other parties to the Framework Convention had agreed to the SPM line-by-line, and after the NRC had reported to the White House its basic endorsement of the IPCC TAR as an admirable summary of research activities that accurately reflected the current thinking of the scientific community.) The boxes were deleted and OCP2003 made essentially no reference to the IPCC. To my knowledge this memo was not shared with other CCSP principals, who did not question the disappearance of the IPCC from the report. I found this troubling, and regarded it as basically a policy-driven, or policy-sensitive, intervention to censor the substantive presentation in a science program document.

USGCRP/CCSP-supported research had played an essential role in the IPCC assessment, and U.S. scientists had played a major role as co-chairs, authors, and reviewers. In contrast, after the IPCC Second Assessment Report was published, the FY 1997 edition of *Our Changing Planet* contained 6-7 pages on the assessment, including a concise extract quoting the key conclusions and clear statements about the importance of the IPCC assessments and the integral role of the USGCRP in supporting the IPCC process.

The administration has also been reluctant and evasive about embracing the Arctic Climate Impact Assessment (ACIA) and communicating and using its findings. ACIA was a major project, commissioned by the U.S. Government along with the other parties to the Arctic Council, funded by CCSP-participating agencies, and chaired by the long-time former chair of the USGCRP interagency committee, with substantial participation of U.S.-based authors and reviewers. Yet the administration has ducked and shortchanged ACIA in a number of ways. The ACIA Overview report was published in late 2004. Publication of the ACIA foundation report has been moving slowly, in large part because the administration has not provided the promised continuation of funding through the University of Alaska to complete the task. ACIA is identified as a key near-term product in the Ecosystems chapter of the CCSP Strategic Plan. Yet hundreds of copies of the report, purchased and earmarked for distribution to Members of Congress and others, have sat for months in boxes in the CCSP Office with no action to put them forward. Why? What roles have CEQ, OSTP, the State Department CCSP principal, and the CCSP Director played in setting the tone on this? Are the CCSP agency principals aware that distribution of the report by the CCSP has been suppressed for this long? If not for political reasons, why is the administration not supporting the continuation of the ACIA effort that had been promised?

Our Changing Planet

I worked on nine editions of *Our Changing Planet*, starting with OCP1997. Each was a complex project that presented its own unique problems in the review and clearance process. I will not dwell on this experience here except to raise a few points about the publication of the OCP FY2004-FY2005 edition, the resulting media coverage, the response of the program leadership, and how I viewed the potential implications for OCP2006.

CEQ held up the publication of OCP2004-2005 for a fairly extended period after the report had been cleared by everyone else. The delay stemmed from their finding that, buried deep in the appendix to the report, a brief reference in the EPA program description to a couple of planned EPA-supported assessment reports related to climate change issues had not been scrubbed. The text in question was very similar to text that had appeared in the same location in the previous OCP without incident. Apparently on this occasion CEQ was exercised that EPA was scheduled to publish scientifically based assessment reports, not shaped by the White House, during the fall of 2004. CEQ delayed the release of OCP until it could be re-vetted in terms of potential public relations pitfalls for the re-election campaign.

Clearly the administration was not happy about the press coverage in connection with the release of OCP2004-2005 in September 2004. However, in teeing up the production of OCP2006, I believed the CCSP leadership's approach should have been one of, first, fully defending the appropriateness of the content of that report, and second, conveying a clear message that OCP contributors and CCSP reviewers were not to be manipulated or distracted by the flap over the press coverage or by other political considerations, but rather were to put forward the best, most timely and significant highlights of recent CCSP-supported research they could offer, in particular with an eye to calling attention to issues that will be of greatest relevance, interest, and concern to the targeted Congressional audience. That would conform to the spirit as well as the letter of the reporting mandate in the Global Change Research Act.

That is not what happened. Instead, in talking about the production of OCP2006 at the CCSP principals meeting on December 1, 2004, the CCSP Director spoke about the political sensitivity of the contents of the report, and how material in the report might be interpreted. He recalled the flurry of press activity that followed the release of OCP2004-2005, from the point of view of complaining about the story in the *New York Times*, i.e., asserting that the reporter had decided to play "gotcha". This was the third or fourth time I had heard him make this point in a meeting, including an earlier talk he had given at a meeting of the Human Dimensions committee at the Academy. There was no acknowledgement of how the administration's relationship to climate science and climate policy might have contributed to how the press, including a number of editorials around the country, approached this material. It was just blame the media.

The CCSP Director said, "We have to assume there are people out there who will look through everything [in OCP2006] looking to play 'gotcha'." So, he said, he needed to advise the CCSP principals that, in drafting, editing, and reviewing OCP2006, everyone should keep in mind the need to not put out anything that could be misinterpreted. "This report will be aggressively reviewed, word by word." I suggested that the CCSP should not be seen as being evasive or failing to include strong research and assessment developments that have been supported by the program, and that the letter of transmittal to Congress, over the signatures of political appointees, was the appropriate vehicle for conveying the administration's position on climate change and the science program, i.e., that the body of the report should be left to the science technocracy, with administration political sensitivities confined to the transmittal letter. "We need to be careful with the text throughout," was his reply.

The CCSP Director's repeated "gotcha" discourse appeared clearly designed to sensitize agency principals, report contributors, the CCSP Office, and reviewers to – what? – make sure that nothing gets published in OCP that could lead the press or other readers to the conclusion that the administration is acknowledging a stronger scientific basis for observed and projected anthropogenic climate change and potential adverse impacts, such that the perceived lack of a strong administration policy on climate change might be further questioned? In any case, I believe this discourse gave the appearance of policing by an administration appointee using criteria other than the most straightforward presentation by science program management professionals, drawing on the research they have supported, while suggesting that the media is the problem rather than the administration itself. I found this troubling and took it as an

indicator that the CCSP's situation vis-à-vis White House politicization was probably deteriorating still further.

It will be interesting to see what OCP2006 contains when it finally comes out, relative to what I saw in the first draft material that was developed from contributions by the CCSP interagency working group co-chairs. What roles will administration politicals play in shaping how science and the science program activity are presented in the report? Those who are associated with producing and clearing this and other future CCSP publications should be aware that this process will be watchdogged and evaluated.

Conclusion

I believe the current CCSP Director and most of the agency principals have attempted to provide sound program management, act as a moderating influence in a political context of hard-liners and ideologues, and in general develop and represent a research and assessment program that will maintain and be worthy of credibility and legitimacy with the leadership of the scientific research community. However, I believe the CCSP Director is caught between trying to perform these functions while at the same time serving as part of the administration's team of political appointees, supporting and implementing decisions driven by the need for White House approval. The two roles appear to conflict at key points. I admire his professionalism, his exemplary personal decency, his concern for the public interest, and what he has tried to accomplish under difficult circumstances. But I believe this administration has sometimes exploited its moderates for their good reputations and credibility while politically undermining their best efforts, requiring them at times to become public advocates on behalf of questionable compromises and incorrect policies, and to speak evasively on behalf of the administration even at the expense of the best interests of their programs.

I believe a number of CCSP managers, members of the research community, and other observers of the program share at least some of my concerns about what is happening, and I expect they could add valuable observations from their own vantage points. At the same time, I am disappointed by the degree of acquiescence I have witnessed among CCSP agency representatives, and have not been seeing the kind of leadership that would inspire my confidence that the current problems will be aired and addressed effectively. Since it appears very likely that what I see as the politicization of key program decisionmaking, by an administration that must be called into question on these issues, is not going to change significantly in the near (or foreseeable) future, I decided that continuing to sacrifice the ability to speak freely and publicly in order to attempt to limit damage and win minor victories on the inside was no longer the most appropriate thing for me to be doing. Making that kind of trade-off only works well for me if I feel well-represented by what the leadership is saying and doing.

At this point, I believe I can better attempt to serve the public interest by playing an independent role. I hope to contribute on an ongoing basis to public understanding of the problems of what happens when scientific information and scientific assessments of climate change are misrepresented and misused in the arenas of politics, policymaking, advocacy groups, and media coverage. Beyond that, I hope to contribute to developing means by which the currently dysfunctional relationships between climate science and these other arenas can be made more fruitful. To do that, I think, requires beginning with an honest description and clear diagnosis of the current situation.